

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
AMERICAN TOWER CORPORATION
:

Plaintiff,
:

- against -
:

Civil Action No. 07-cv-11629
:

JIDE ZEITLIN, THE KEFFI GROUP, LTD., and
INDEPENDENT MOBILE INFRASTRUCTURE :
LTD.,
:

Defendants.
:
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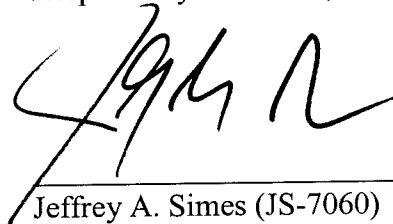
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U.S. DISTRICT COURT
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S.D. OF N.Y.

NOTICE OF MOTION FOR ADMISSION
PRO HAC VICE OF JAMES REHNQUIST AND CHRISTINA NOLAN

PLEASE TAKE NOTICE that, upon the Declaration of Jeffrey A. Simes submitted herewith, the undersigned respectfully moves this Court for an Order pursuant to Rule 1.3(c) of the Local Rules of this Court, admitting James Rehnquist and Christina Nolan *pro hac vice* to the Bar of this Court, to argue or try this case in whole or in part as counsel.

Dated: January 15, 2008
New York, New York

Respectfully submitted,



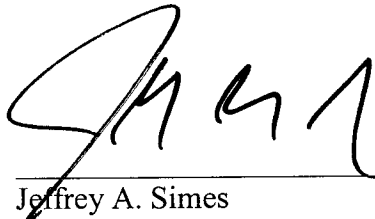
Jeffrey A. Simes (JS-7060)
GOODWIN PROCTER LLP
599 Lexington Avenue
New York, NY 10022
Tel: 212.813.8800
Fax: 212.355.3333
e-mail: jsimes@goodwinprocter.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned, a member of the Bar of this Court, hereby certifies that on the 17th day of January, 2008, I caused true copies of the foregoing Notice of Motion for Admission Pro Hac Vice of James Rehnquist and Christina Nolan and the annexed Affidavit of Jeffrey A. Simes to be served via federal express, upon the following counsel of record in this action.

Alan D. Rose
Nicholas J. Rosenberg
Rose, Chinitz & Rose
29 Commonwealth Avenue
Boston, MA 02116



Jeffrey A. Simes

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN TOWER CORPORATION	:
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Plaintiff,	:
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- against -	:
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JIDE ZEITLIN, THE KEFFI GROUP, LTD., and	:
INDEPENDENT MOBILE INFRASTRUCTURE	:
LTD.,	:
	:
Defendants.	:
	:
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Civil Action No. 07-cv-11629

**DECLARATION OF JEFFREY A.
SIMES IN SUPPORT OF MOTION
FOR ADMISSION PRO HAC VICE
OF JAMES C. REHNQUIST AND
CHRISTINA E. NOLAN**

JEFFREY A. SIMES, being duly sworn, deposes and says:

1. I am a member of the firm of Goodwin Procter LLP, and a member in good standing of the Bar of this Court since 1997. I make this Declaration in support of the motion, pursuant to Rule 1.3(c) of the Local Rules of this Court, for admission of James C. Rehnquist and Christina E. Nolan to the Bar of this Court *pro hac vice*.


2. Mr. Rehnquist is a partner at Goodwin Procter LLP, which is counsel to defendants Jide Zeitlin, The Keffi Group, Ltd. and Independent Mobile Infrastructure Ltd., in this action. He is a member in good standing of the Bar of the Commonwealth of Massachusetts. Attached as Exhibit 1 to the accompanying Declaration of Mr. Rehnquist is the Certificate from the Commonwealth of Massachusetts stating that Mr. Rehnquist is a member in good standing of the Massachusetts Bar. He is also admitted to practice before, and is in good standing with, the United States Supreme Court, the United States Court of Appeals for the First, Fifth, Ninth and Federal Circuits and the United States District Court for the District of Massachusetts. Mr.

Rehnquist is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules of this Court. No disciplinary proceedings have ever been brought against Mr. Rehnquist in any State or Federal court.

3. Ms. Nolan is an associate at Goodwin Procter LLP, which is counsel to defendants Jide Zeitlin, The Keffi Group, Ltd. and Independent Mobile Infrastructure Ltd., in this action. She is a member in good standing of the Bar of the Commonwealth of Massachusetts. Attached as an Exhibit 1 to the accompanying Declaration of Ms. Nolan is the Certificate from the Commonwealth of Massachusetts stating that Ms. Nolan is a member in good standing of the Massachusetts Bar. She is also admitted to practice before, and is in good standing with, the United States District Courts for the District of Massachusetts. Ms. Nolan is familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules of this Court. No disciplinary proceedings have ever been brought against Ms. Nolan in any State or Federal court.

4. Accordingly, I respectfully request that James C. Rehnquist and Christina E. Nolan be admitted to the Bar of this Court pro hac vice.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of January, 2008.



Jeffrey A. Simes (JS-7060)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN TOWER CORPORATION :
:
Plaintiff, : Civil Action No. 07-cv-11629
:
- against - : **DECLARATION OF JAMES C.**
:
JIDE ZEITLIN, THE KEFFI GROUP, LTD., and : **REHNQUIST IN SUPPORT OF**
INDEPENDENT MOBILE INFRASTRUCTURE : **MOTION FOR ADMISSION PRO**
LTD., : **HAC VICE**
:
Defendants. :
:
----- X

JAMES C. REHNQUIST, being duly sworn, deposes and says:

1. I am a member of the firm of Goodwin Procter LLP. I make this Declaration in support of the motion, pursuant to Rule 1.3(c) of the Local Rules of this Court, for admission to the Bar of this Court *pro hac vice*.

2. I am a partner at Goodwin Procter LLP, which is counsel to defendants Jide Zeitlin, The Keffi Group, Ltd. and Independent Mobile Infrastructure Ltd., in this action. I am a member in good standing of the Bar of the Commonwealth of Massachusetts. Attached as Exhibit 1 to this Declaration is the Certificate from the Commonwealth of Massachusetts stating that I am a member in good standing of the Massachusetts Bar.

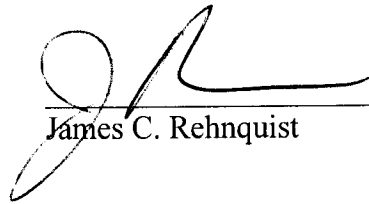
3. I am also admitted to practice before, and am in good standing with, the United States Supreme Court, the United States Court of Appeals for the First, Fifth, Ninth and Federal Circuits and the United States District Court for the District of Massachusetts.

4. I am familiar with the Federal Rules of Civil Procedure, the Federal Rules of

Evidence and the Rules of this Court.

5. No disciplinary proceedings have ever been brought against me in any State or Federal court.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
14th day of January, 2008.



James C. Rehnquist

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **fourteenth** day of **December** A.D. **1988**, said Court being the highest Court of Record in said Commonwealth:

James C. Rehnquist

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **fifteenth** day of **January** in the year of our Lord **two thousand and eight**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
AMERICAN TOWER CORPORATION :
:
Plaintiff, : Civil Action No. 07-cv-11629
:
- against - : **DECLARATION OF CHRISTINA E.**
:
JIDE ZEITLIN, THE KEFFI GROUP, LTD., and : **NOLAN IN SUPPORT OF MOTION**
INDEPENDENT MOBILE INFRASTRUCTURE : **FOR ADMISSION PRO HAC VICE**
LTD., :
:
Defendants. :
:
----- X

CHRISTINA E. NOLAN, being duly sworn, deposes and says:

1. I am a member of the firm of Goodwin Procter LLP. I make this Declaration in support of the motion, pursuant to Rule 1.3(c) of the Local Rules of this Court, for admission to the Bar of this Court *pro hac vice*.

2. I am an associate at Goodwin Procter LLP, which is counsel to defendants Jide Zeitlin, The Keffi Group, Ltd. and Independent Mobile Infrastructure Ltd., in this action. I am a member in good standing of the Bar of the Commonwealth of Massachusetts. Attached as Exhibit 1 to this Declaration is the Certificate from the Commonwealth of Massachusetts stating that I am a member in good standing of the Massachusetts Bar.

3. I am also admitted to practice before, and am in good standing with, the United States District Court for the District of Massachusetts.

4. I am familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Rules of this Court.

5. No disciplinary proceedings have ever been brought against me in any State or Federal court.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
14 day of January, 2008.

A handwritten signature in black ink, appearing to read "Christina E. Nolan", written over a horizontal line.

Christina E. Nolan

COMMONWEALTH OF MASSACHUSETTS

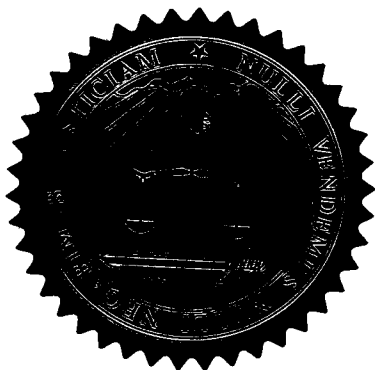
SUFFOLK, SS.

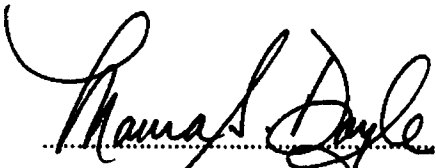
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **sixteenth** day of **December** A.D. **2004**, said Court being the highest Court of Record in said Commonwealth:

Christina E. Nolan

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **fifteenth** day of **January** in the year of our Lord **two thousand and eight**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AMERICAN TOWER CORPORATION

Plaintiff,

- against -

JIDE ZEITLIN, THE KEFFI GROUP, LTD., and
INDEPENDENT MOBILE INFRASTRUCTURE
LTD.,

Defendants.

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Civil Action No. 07-cv-11629

[PROPOSED] ORDER ADMITTING COUNSEL *PRO HAC VICE*

Upon consideration of the Notice of Motion for Admission *Pro Hac Vice* of James C. Rehnquist and Christina E. Nolan dated January ___, 2008, and the accompanying Affirmation of Jeffrey A. Simes sworn to on January ___, 2008, it is hereby:

ORDERED that, pursuant to Local Civil Rule 1.3(c) of the Local Rules of this Court, James C. Rehnquist and Christina E. Nolan are hereby admitted *pro hac vice* to the Bar of this Court for the purpose of representing defendants Jide Zeitlin, The Keffi Group, Ltd. and Independent Mobile Infrastructure Ltd., in the above-captioned proceeding.

United States District Judge

Dated: _____, 2008